

UNITED STATES DISTRICT COURT

for the

Western District of North Carolina

United States of America)

v.)

Case No. 3:16-mj-91

(1) Shanna Jean Brandon)
(2) Erick Yahir Rodriguez-Salomon)*Defendant(s)*

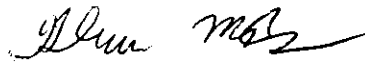
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2016 to 3/9/2016 in the county of Mecklenburg in the
Western District of North Carolina, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 846, 841(a), 841(b)(1)(A)	Conspiracy to distribute and to possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine.
18 U.S.C. 924(c)	Possession of firearm in furtherance of drug trafficking.
18 U.S.C. 922(g)	(Rodriguez-Salomon only:) Possession of firearm by prohibited person.

This criminal complaint is based on these facts:

FILED
CHARLOTTE, NC**MAR 15 2016****U.S. DISTRICT COURT**
WESTERN DISTRICT OF NC☒ Continued on the attached sheet.*Complainant's signature*

Glenn MacDonald, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/15/2016*Judge's signature*City and state: Charlotte, North Carolina

U.S. Magistrate Judge David C. Keesler

Printed name and title

ATTACHMENT A:
CRIMINAL COMPLAINT AFFIDAVIT IN SUPPORT OF ARREST WARRANTS FOR
(1) SHANNA JEAN BRANDON AND (2) ERICK YAHIR RODRIGUEZ-SALOMON

I, Glenn MacDonald, Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), being duly sworn do hereby depose and state the following in support of a complaint and arrest warrants for Defendants **(1) Shanna Jean Brandon** and **(2) Erick Yahir Rodriguez-Salomon**:

BACKGROUND

1. I am employed as a Special Agent with the United States Department of Homeland Security Investigations (HSI), formerly Immigration and Customs Enforcement (ICE), stationed in Charlotte, North Carolina. I have been so employed since October of 2001. Prior to my employment with HSI, I was employed as Border Patrol Agent for approximately six years. In connection with my official duties, I investigate violations of the Controlled Substance Act, and have received specialized training in the enforcement of laws concerning money laundering and controlled substances as found in Titles 18 and 21 of the United States Code. In connection with my duties and responsibilities as a federal law enforcement officer, I have conducted and/or assisted with over a hundred investigations involving violations of federal drug and money laundering laws, and have testified in numerous judicial proceedings and prosecutions for violations of laws concerning controlled substances and/or money laundering.

2. As a result of my personal participation in the investigation of matters referred to in this Affidavit, and based upon reports made to me by other law enforcement officials, I am familiar with the facts and circumstances of this investigation. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for a Complaint and Arrest Warrants, I have not included each and every fact known to me concerning this investigation. I

have set forth only the facts that I believe are necessary to establish the requisite foundation for a probable cause finding.

FACTUAL STATEMENT

3. On **February 3, 2016**, Charlotte-Mecklenburg Police Department officers conducted a traffic stop of a vehicle driven by Defendant (2) Erick Yahir Rodriguez-Salomon for having a burnt-out front right headlight. Upon approaching the vehicle, the officers saw in plain view an open container of Mike's hard alcoholic beverage in a red/black can in the center console. Defendant Rodriguez-Salomon admitted that he did not then have a driver's license and was aware that his front headlight was burned out. Moreover, the passenger had a marijuana cigarette on his person. Even though they had probable cause to search, they asked for and obtained consent from Rodriguez-Salomon to search the vehicle.

4. The officers found a 9mm Smith & Wesson handgun (serial number TBS1744) and a filled ammunition magazine inside the center console of the vehicle. The firearm was manufactured outside the State of North Carolina. After waiving his *Miranda* rights, Rodriguez-Salomon admitted that the firearm was his and that he kept it for protection. The officers also found a bag filled with U.S. currency strapped underneath the passenger seat. Rodriguez-Salomon stated that the car belonged to his girlfriend, Shanna Jean Brandon.

5. Defendant Rodriguez-Salomon has a felony conviction and a domestic violence conviction from Georgia (on 9/29/2003 for Family Domestic Violence – 2nd or Subsequent Offense). In addition, he is an illegal alien. Therefore, he was prohibited from possessing the aforementioned firearm. While Rodriguez-Salomon was in jail for the aforementioned gun crime, he placed several calls to Brandon in which he asks her to collect money owed to him.

6. On **February 29, 2016**, a confidential informant contacted law enforcement and

said that she/he had 42 grams of methamphetamine that she/he had received from Defendant Brandon that she/he wanted to turn in. Law enforcement reported to the CI's residence in Mint Hill and retrieved the methamphetamine.

7. During the investigation, a confidential informant advised law enforcement that Defendants (1) Shanna Jean Brandon and (2) Erick Yahir Rodriguez-Salomon were in an intimate relationship and, when Rodriguez-Salomon was arrested and pending deportation, Brandon took over his trafficking business. (Rodriguez-Salomon is in fact pending deportation.)

8. On **March 9, 2016**, law enforcement in Georgia stopped Defendant Shanna Jean Brandon in her vehicle and found her in possession of approximately 36 grams of methamphetamine, approximately \$13,000 in U.S. currency, and a firearm.

9. Defendant Brandon provided a post-*Miranda* confession in which she stated, among other things, the following: Her husband, Erick Rodriguez-Salomon, was in jail in Georgia on an ICE warrant for a firearm violation. Brandon was a mid-level dealer in Charlotte, selling methamphetamine that she picked up from Fort Worth, Texas. She picked up large quantities of "ice" (high-purity methamphetamine) each time, including 3 kilograms one time and 10 kilograms another. She conducted between \$30,000 and \$60,000 of money laundering transactions through banks to send funds to her source of supply. She also admitted that the drugs and gun in her car belonged to her, and that she had the gun for protection while making drug runs.

10. Based on my training and experience, firearms are a tool of the drug trafficking trade – to protect traffickers, their drug, and their proceeds from would-be robbers, competitor drug dealers, and law enforcement – therefore, based on the facts of this investigation, I submit that the firearms that the Defendants possessed were in furtherance of drug trafficking.

11. Defendant Brandon has an outstanding warrant for failing to appear on a charge of Driving while under the Influence of a Controlled Substance in 2006.

12. Defendant Rodriguez-Salomon has, in addition to the felony domestic violence conviction referenced above, convictions for Escape in 2005 and Battery in 2005, as well as probation violations.

CONCLUSION

Based on the information herein, this affiant requests that a complaint and arrest warrants be issued based on probable cause that Defendants (1) **Shanna Jean Brandon** and (2) **Erick Yahir Rodriguez-Salomon** conspired to distribute and to possess with intent to distribute at least 500 grams of methamphetamine, in violation of Title 18, United States Code, Sections 846, 841(a), and 841(b)(1)(A); and they possessed firearms in furtherance of drug trafficking, in violation of Title 18, United States Code, Section 924(c). Additionally, Defendant (2) **Erick Yahir Rodriguez-Salomon** possessed a firearm as prohibited person (felon, domestic violence convict, and illegal alien), in violation of Title 18, United States Code, Section 922(g).



AFFIANT, SPECIAL AGENT GLENN MacDONALD
HOMELAND SECURITY INVESTIGATIONS

AUSA Steven R. Kaufman reviewed this Affidavit.

Sworn to and subscribed before me this 15th day of March 2016.



THE HONORABLE DAVID C. KEESLER
UNITED STATES MAGISTRATE JUDGE